

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

Division

Rajamani Senthilnathan (aka "Senthil Rajamani")

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

AT&T Inc.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Rajamani Senthilnathan
Street Address	2908 Majestic Oaks Pass
City and County	Austin
State and Zip Code	Texas 78732
Telephone Number	737 - 333 - 2598
E-mail Address	senthil.rajamani@blitzmachines.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

1 Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name	AT&T Inc.
Job or Title <i>(if known)</i>	
Street Address	208 South Akard Street
City and County	Dallas, Dallas County
State and Zip Code	Texas 75202
Telephone Number	210-821-4105
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Racketeer Influenced and Corrupt Organizations Act 18 U.S.C 1962 (c)

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff *(name)* _____ is a citizen of the
State of *(name)* _____

b. If the plaintiff is a corporation

The plaintiff *(name)* _____ is incorporated
under the laws of the State of *(name)* _____
and has its principal place of business in the State of *(name)* _____

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant *(name)* _____ is a citizen of
the State of *(name)* _____ Or is a citizen of
(foreign nation) _____

b. If the defendant is a corporation

The defendant (name) _____ is incorporated under
the laws of the State of (name) _____ and has its
principal place of business in the State of (name) _____
Or is incorporated under the laws of (foreign nation) _____
and has its principal place of business in (name) _____

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

AT&T's hiring and exit manager, and his coterie of friends destroyed my career. I have a master's degree in EE (video compression) and a master's in business administration from a program ranked in the top 10 in the nation.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

My skills in video-encoding was proven to AT&T in my resume of 2010. I worked in a contract position in video-encoding initially at AT&T.

I applied to networking-group for a full-time opening in mid-2010 since I thought I could learn new skills from an up-and-coming company-wide expert in networking. But I later realized I was hired to the networking job as a dummy with graduate degree, even when I didn't answer a basic networking question. I realized much later that was a fundamental concept in networking. This was the beginning of all problems. I realized the manager intended to hold me hostage forever, or keep me within his circle so his mode of operation is not outed.

The hiring-manager had a hand in my house-search in Austin, in the same neighborhood. My offer for full-price was turned down after viewing a property with this manager. I instead closed on another property which wasn't in as prime a location close to school, probably, where his coterie of friends could wield better control. Note, I gave a blank letter allowing him to enter my premises to let the gas-company come-in and start service when I was in the process of relocating from Dallas to Austin. It seems like he shared this letter with his coterie so they could send anyone to break into my premises at will (a complaint to Travis County Sheriff's Office on possible break-in in Nov-Dec 2013 resulted in no outcome), as he probably did, later, with my passwords and usernames, written on a piece of paper during exit-interview.

Within a short-time of joining this manager's group, I realized it wasn't a good fit for me. I was applying for video-coding related jobs internally and externally since I have a master's in EE (with concentration in advanced video-coding) and a top-10 MBA degree. The manager, Michael Raftelis, specifically told me he'd be penalized if new employees left the job quickly. He realized I was poised to leave anyway, and caused (what was then diagnosed as) shoulder-instability in my child in early 2012, subsequently treated with physical therapy for a few weeks (what was then construed as successful treatment for the condition).

Four years later, this was diagnosed as 19~20 degree scoliosis curve in the vertebrae. Despite periodic doctor visits, annuals at doctor's office and physical exam at school during this time, there was no diagnosis of this condition. I allege the manager uses indirect electronic means to pass messages among his large coterie, who may themselves operate a large pyramid electronically, without any direct communication, that led physicians not to diagnose this condition. Note that, a number of physicians from this health-care provider, Austin Regional Clinic, have moved (to other states) since then. Note that the school superintendent (Leander ISD) has moved also, after ~22 years of service with this school district. During this time, the manager used one member of his coterie, H.Z. to get me to leave the company on my own (H.Z. said that I have young children and I should look for a more engineering-oriented firm where I can grow my career better), and I mistook it as the particular employee (a peer) eliminating competition for a promotion. Unbeknownst then, but the child's vertebrae was already bent.

It is worse than evil that the person would harm a child, and then get me to leave to keep me busy. Basically, the manager was looking at all my activity (and my family's activity) and made every attempt to keep me busy and out of his path, (or fully locked-in with his friends), once he realized I wouldn't fit into his coterie, and/or that I would out his means of operation. Between him and his large coterie, he had the technical capability and the resources to do so, and modern technology has made such effort possible for near zero-cost. I now realize the manager was watching all activity (not just internal company-activity) from the first point of contact with him, when I was commuting from Dallas, when I relocated to Austin, when I looked for houses, when I interviewed externally, and even after leaving the company.

He used one member of his coterie to deny access to home-reference lab, where 3rd party devices were tested. He used another to find out I was about to resign, within days of suicide of an employee, a math PhD, who clamored for challenging work; and others to spread rumor/clutter, regarding my skills.

The hiring-manager was also the exit-manager, and I am unable to verify employment with AT&T, so I assume I was framed after I resigned. He pretended I was qualified for networking-supervisor position as of June 2014 (again, I realized much later that I lacked skills in networking). If he had clearly told me he was hiring me as a seat-warmer I would have run away in the opposite direction, and taken the video-encoding job offered at the same time in Atlanta. Related cases 15-04331 in G134th Dallas dismissed, as I was still researching; 3-15CV1144-N filed in this court, also still researching, then.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Item 1:

Treble of earnings lost from age 42 when I resigned, until age 65 :

(150,000 base salary + 20,000 benefits) * 3 * 23 = \$ 11,700,000

This is discounted already, since it doesn't include periodic raises. Also note: I only asked to be paired up with a researcher of my choice earlier (or both a researcher and business-leader of my choice, both professional acquaintances) but there wasn't a positive response from the defendant.

Item 2:

Equivalent of executive health-care for life, for both children and spouse, funded at the highest tranche above AT&T debt, to be fully funded if the organization ceases existence for any reason, since all these medical problems arose after moving, and the manager had a hand in my house-search. This arose because the manager racketeered, is still racketeering, and for this reason, the company ought to provide the best of health-care that the executives enjoy.

Item 3:

Redact false statements, by entering redaction in Federal Registry, before settling DirecTV anti-trust suit with the Department of Justice, so it can be referenced in the future. I was still researching what happened when my case in the Dallas County court was dismissed, and the merger happened (and was approved) unbeknownst to me. So I am requesting that AT&T voluntarily hold off on settling with the Department of Justice (end of public comment period on DoJ settlement is June 13, 2017) until AT&T responds to this complaint.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/23/2017

Signature of Plaintiff s/Rajamani Senthilnathan

Printed Name of Plaintiff Rajamani Senthilnathan

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) _____

DEFENDANTS

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) _____

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____